

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JUSTIN SULLIVAN

Case Number: 19-cv-6500

v.

AIRCRAFT SERVICES GROUP, INC. and  
KERRY SAILLER

Defendants.

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**VERIFIED COMPLAINT AND JURY DEMAND**

Justin Sullivan, by his undersigned attorneys, for his complaint, states the following:

**Introductory Statement**

1. Justin Sullivan (“**Sullivan**”), the plaintiff, does business as a private airplane charter executive. By email dated October 3, 2019, the defendant Aircraft Services Group, Inc. (“**ASG**”), through its director of sales, the co-defendant, Kerry Sailer (“**Sailer**”), published allegations of fraudulent and possibly criminal conduct by Justin Sullivan. The email was sent to 150 private airplane charter operators, and then forwarded on to more than 500 charter brokers – all persons or entities who work in the same industry as Sullivan, and many of whom know or are known to each other, as well as Sullivan. Among those who received this email was virtually every supplier of Sullivan’s charter brokerage business and virtually every customer who has ever booked a wholesale charter flight with Sullivan. Sullivan committed no malfeasance of any kind. ASG knew

of Sullivan's innocence and willfully published the false allegations. Despite demand, the defendants have refused to retract the defamatory email.

### **Parties**

2. The Plaintiff, Justin Sullivan ("**Sullivan**"), d/b/a Private FLITE, is an individual with a principal residence located at 108 Plymouth Street, Carver, Massachusetts.
3. The Defendant, Aircraft Services Group, Inc. ("**ASG**"), is a New Jersey Corporation with a principal place of business located at 401 Industrial Ave Teterboro, New Jersey, and operating bases at 9100 Republic Airport Road, Farmingdale, and White Plains, New York.
4. The Defendant, Kerry Sailer, is an individual who resides, upon information and belief at 53 17<sup>th</sup> Street, West Babylon, New York.

### **Jurisdiction and Venue**

5. This is a civil action asserting state common law and statutory claims arising from alleged defamation. The Court has jurisdiction pursuant to 28 U.S.C. § 1332 in that the plaintiff and all of the defendants are citizens of different states, to wit: Massachusetts, New Jersey, and New York, and the amount in controversy exceeds \$75,000.
6. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(c) in that a substantial part, if not all, of the events or omissions giving rise to the claims occurred or are continuing to occur in this district, and the defendants are subject to personal jurisdiction in this district.
7. Defendant Sailer is a citizen of New York.
8. Defendant ASG has at least two large physical locations in New York, and employs dozens of New York employees.

**Statement of Facts**

9. Operating as Private FLITE, Sullivan has been a private aircraft charter broker for approximately 15 years.
10. In this capacity, Sullivan has had contractual arrangements with a number of operators of private airplanes, who render charter flights to Sullivan's clientele, (the "**Broker Business**").
11. Sullivan also has had proprietary, contractual arrangements with owners and operators of private airplanes, as well as pilots and vendors of aviation goods and services. In 2019, Sullivan managed two private airplanes (the "**Management Business**").
12. The jet charter industry is comprised of "brokers" like Sullivan, and "operators" like ASG who are air carriers certified by Federal Aviation Administration to operate charter flights on private airplanes that are leased from the owners of the airplanes.
13. The jet charter industry relies on goodwill and the expectation that counterparties will perform on their obligations. Bad actors who do not fulfill obligations are often put on informal 'blacklists' and denied terms and opportunities.
14. From May 5, 2019, to August 10, 2019, Sullivan's Management Business arranged with Metropolitan Aviation of Dulles, Virginia ("**Metropolitan**"), to lease two aircraft from Sullivan.
15. At no time was Sullivan an owner, employee, or officer of Metropolitan or any of its affiliated companies.
16. Sullivan was never a signatory on a Metropolitan account.

17. During the period of time that Sullivan affiliated with Metropolitan, the sole officer of Metropolitan was Alan Cook.
18. On or about August 15, 2019, through counsel, Sullivan terminated the Aircraft Lease Agreements with Metropolitan.
19. As of August 15, 2019, Metropolitan lacked the proper economic authority to operate the airplanes that Sullivan had leased to Metropolitan.
20. As of August 15, 2019, Metropolitan and Sullivan's business relationship was terminated.
21. More than a month after the above-mentioned termination, Metropolitan apparently had difficulty fulfilling booked trips and refunding monies to clients.
22. Sullivan had nothing to do with Metropolitan's inability to fulfil booked trips.
23. My Jet Saver, LLC ("**MJS**"), is an operator of private airplanes based in Opa Locka, Florida. MJS is an air carrier, and specializes in the type of aircraft that Sullivan managed.
24. In August, 2019, Sullivan and Alejandro Marin, CEO of MJS, negotiated the terms for MJS to lease two airplanes from Sullivan.
25. Subsequently, Sullivan and MJS agreed on a term sheet, Sullivan relocated aircraft to MJS in Florida, and the arrangement commenced, adding the aircraft to MJS' fleet insurance policy, performing a compliance checklist for the FAA, hiring pilots and scheduling flight simulator training for new pilots.
26. On or about October 4, 2019, Sullivan was made aware of an email (hereinafter the "**Email**"), which was drafted and transmitted on or about October 3, 2019 by Kerry Sailer, director of charter sales for ASG. A true and accurate copy of the email is attached hereto and incorporated herein as **Exhibit A**.

27. Sailer transmitted the email from her ASG email address: ksailer@jetasg.com.
28. Sailer was an employee and agent of ASG, and acting within the scope of her authority for ASG when she transmitted the Email.
29. Sailer transmitted the Email from New York state.
30. The Email was directed to approximately 150 private airplane operators and then forwarded on to more than 500 charter brokers. It reads as follows:

*Subject: \*\*Operators Beware\*\**

*Metropolitan Aviation – Marketing at [sic] NextFlight*

*As I understand it, they book the trips, get the payment and cannot complete the flights for one reason or another and brokers are unable to get their money back.*

*NextFlight tried to recover a flight using us however they were unable to execute the contract properly and we walked away from the trip.*

*Players*

*Ben Gottshall  
Alan Cook  
John Wood  
Justin Sullivan*

*There is more to this story.*

*Justin Sullivan of PrivateFlite/UbAir and now AJAX Jets had a Falcon 50 on Metropolitan's Cert and recently moved it to FL based MyJetSaver Cert and I believe the same shenanigans may [sic] continue over there.*

*I know many of you folks outsource so I wanted to give a heads up!*

*If any one has any Operator/Broker horror stories to share I encourage it to save us all the headache.*

*Thanks and have a great day!*

31. Among the approximately 150 operators who received the Email is virtually every supplier of Sullivan's Broker Business.
32. Among the approximately 500 brokers who received the forwarded version of the Email is virtually every customer who has ever booked a wholesale charter flight with Sullivan's Management Business.
33. It is not clear why ASG thought it appropriate to link Sullivan to Metropolitan's financial problems and the personnel at that company who may be responsible for them.
34. ASG did not lose any funds to Metropolitan.
35. ASG has not suffered any harm as a result of any act or omission of Sullivan.
36. Sailer has not suffered any harm as a result of any act or omission of Sullivan.
37. No airplane owner, operator, broker, or anyone else involved in the private airplane charter industry has suffered any harm as a result of any illegal or unethical act or omission of Sullivan.
38. Nevertheless, the effect of the Email is that it has improperly and falsely lumped Sullivan in with, not only Metropolitan but also two of its disgraced staff: Alan Cook and Benjamin Gottshall, the latter of whom pled guilty in 2014 in Pennsylvania to unlawful use of a computer, a third-degree felony.
39. Upon information and belief, Benjamin Gottshall's guilty plea is well known in the private air charter/broker industry, because Gottshall had been accused of stealing over \$80,000 from an air charter service after issuing commission payments to himself at a higher rate and using a group credit card for personal expenses.
40. Benjamin Gottshall *replaced* Sullivan after Sullivan's departure from Metropolitan, and the two men have never worked together, been affiliated, spoken or met.

41. The Email also referenced Sullivan's Broker Business trade name, Private FLITE.
42. At no time did Metropolitan use the Private FLITE trade name in connection with any service.
43. At no time did Sullivan use the Private FLITE trade name in connection with Metropolitan.
44. The Email either states or insinuates that Sullivan, individually, and/or through his Broker Business trade name Private FLITE, has somehow participated with Metropolitan and its personnel in unethical conduct.
45. In crafting and sending the Email, Sailer deliberately targeted Sullivan's Broker Business which she knew had nothing to do with Metropolitan.
46. Sailer took the above-referenced action with the intention of causing Sullivan harm by disparaging his reputation with every supplier of his Broker Business, and every wholesale customer of his Management Business.
47. Additionally, the Email referenced a third party, MJS and alleged that that entity is also converting charter brokers' monies.
48. MJS has not converted charter brokers' monies. The suggestion that it has is false.
49. The transmission of the Email has interfered with Sullivan's business relationship with MJS.
50. The allegations set forth in the Email, which were shared widely in the industry, have caused and will continue to cause Sullivan significant economic harm.
51. On or about October 5, 2019, Sullivan had telephone conversations with Sailer in which he attempted to set the record straight for her and educate her about the true facts as they related to Sullivan's interactions with Metropolitan.

52. In the October 5, 2019 telephone call, Sullivan also advised Sailer that the Email was not only false, but also potentially defamatory, and was causing him significant economic harm.
53. In the October 5, 2019 telephone call Sullivan requested that Sailer correct the record.
54. Not only did Sailer refuse to correct the record, but she outlined a personal vendetta against Sullivan, and expressed that the objective of the email was for Sullivan to “stay in his lane” as a charter broker and get out of the jet management business entirely.
55. In the October 5, 2019 telephone call, Sailer expressed her belief that Sullivan was guilty by association with Metropolitan’s disgraced owner, when she said to him, “If you walk with someone with a broken leg, you’re going to get a limp.”
56. As of the date of the transmission of the Email, Sullivan had a valid contractual agreement with MJS to lease the airplanes that Sullivan represented.
57. Subsequent to the Email’s publication, Sullivan’s agreement with MJS was terminated.
58. Sullivan has lost numerous other business opportunities as a direct and proximate result of the allegations in the Email.
59. Sullivan has calculated his lost business opportunities resulting from the transmission of the Email to be in the hundreds of thousands of dollars.
60. By letter dated October 8, 2019 (“**Demand Letter**”), Sullivan, through counsel made demand a written demand on ASG.
61. Among the requests for relief set forth in the Demand Letter was that ASG publish a retraction of the Email.
62. ASG declined to publish a retraction.



**CAUSES OF ACTION**

**COUNT I**

(Libel Per Se against ASG and Sailer)

63. Sullivan restates, realleges, and incorporates herein by reference all previous paragraphs of this Verified Complaint.
64. ASG, through Sailer, deliberately and with knowledge of the falsity or reckless disregard as to the truth, published false allegations about Sullivan's conduct by authoring and transmitting the Email.
65. The allegations contained in the Email suggest that Sullivan has converted third party funds, or has otherwise engaged in criminal conduct.
66. Sailer published the Email without privilege or authorization.
67. The allegations contained in the Email concern Sullivan's trade and business.
68. The allegations contained in the Email impugned the basic integrity, creditworthiness, and competence of Sullivan and his business.
69. The allegations contained in the Email carry a precise meaning so as to give rise to a clear factual implication of criminal and/or unethical conduct on Sullivan's part.
70. ASG's Email allegations against Sullivan were objectively capable of proof or disproof.
71. Both (a) the full context of ASG's Email, and (b) the broader context of the industry and the relationship of the parties involved, signaled to the reader the nature of the allegations as an assertion of purported fact.
72. As a result thereof, Sullivan has suffered damages as a result of the defamatory Email in an amount to be proven at trial, but in excess of \$240,000.00.
73. ASG is vicariously liable to Sullivan for the acts of its employee and agent, Sailer.

74. ASG is directly liable for failing and refusing to publish a retraction of a knowingly false and defamatory statement as to Sullivan.

## **COUNT II**

### **(Intentional Interference with Contract and with Advantageous Business Relationships against ASG and Sailer)**

75. Sullivan restates, realleges, and incorporates herein by reference all previous paragraphs of this Verified Complaint.
76. At the time of the defendants' distribution of the defamatory Email, Sullivan had a valid contractual agreement with My Jet Saver.
77. At the time of the defendants' distribution of the defamatory Email, Sullivan had either valid contractual agreements or advantageous business relationships with third parties.
78. At the time of the transmission of the Email, the defendants had knowledge of Sullivan's contractual agreement with third parties.
79. At the time of the transmission of the Email, the defendants had knowledge of Sullivan's contracts and/or advantageous business relationships with third parties.
80. The false and defamatory allegations in the Email and the transmission thereof were a direct and proximate result of Sullivan losing his contract with MJS.
81. The false and defamatory allegations in the Email and the transmission thereof were a direct and proximate result of Sullivan losing his contracts and/or advantageous business relationships with third parties.
82. The defendants intended to interfere with Sullivan's contractual relationship with MJS.
83. The defendants intended to interfere with Sullivan's contractual relationships and/or advantageous business relationship with third parties.

84. Sullivan suffered monetary damages in an amount in excess of \$240,000.00, to be proven at trial, as a result of the defendants' interference.

### **COUNT III**

(Violation of New York General Business Law § 349 against ASG)

85. Sullivan restates, realleges, and incorporates herein by reference all previous paragraphs of this Complaint.
86. The acts and omissions of ASG complained of herein constitute unfair and deceptive business practices in violation of New York General Business Law § 349, and proscribed by the New York Attorney General.
87. The acts and omissions of ASG complained of herein were knowing and willful violations of said New York Gen. Bus. Law § 349.
88. The acts and practices complained of herein occurred primarily and substantially in the state of New York.
89. The aforesaid unfair acts and practices have caused Sullivan to incur a loss of money and/or property, including but not limited to lost business opportunities, attorneys' fees, and other damages.
90. As a result thereof, Sullivan suffered monetary damages in an amount in excess of \$240,000.00, to be proven at trial.

### **PRAYERS FOR RELIEF**

WHEREFORE, the plaintiff, Justin Sullivan, prays that this Honorable Court enter orders for the following relief:

- A. Enter judgment for the plaintiff, Justin Sullivan, and against the defendants, Aircraft Services Group, Inc. and Kerry Sailer, jointly and severally, pursuant to Counts I and II of the Verified Complaint in an amount to be determined by the Court;
- B. Enter judgment for the plaintiff and against the defendants, Aircraft Services Group, Inc. and Kerry Sailer, jointly and severally, pursuant to Count III of the Verified Complaint in an amount to be determined by the Court;
- C. Pursuant to Count III, treble the amount of said damages, and award Sullivan his reasonable attorney's fees and costs, together with interest at the statutory rate; and
- D. Enter such other further relief as is equitable and just.

**JURY DEMAND**

The Plaintiff demands a trial by jury on all counts so triable.

Dated: November 18, 2019

*/s/ Edward S. Stone*

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*/s/Seth H. Salinger (BBO # 555426)*

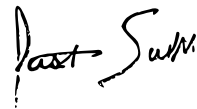
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*Pro Hac Vice to be filed*  
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**VERIFICATION**

I, Justin Sullivan, the plaintiff herein, hereby certify that I have read the foregoing Complaint, that the facts contained therein, as they pertain to me or my participation, are true, and that, I have made a reasonable and diligent investigation to confirm the validity of so much of the facts as are alleged upon information and belief, and after such investigation, I believe them to be true.

Signed under the pains and penalties of perjury this 15<sup>th</sup> day of November 2019.

A handwritten signature in black ink, appearing to read "Justin Sullivan", is written above a horizontal line.

Justin Sullivan

# EXHIBIT A

# EXHIBIT A



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1 message

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**From:** Alejandro Marin <[ajmarin@myjetsaver.com](mailto:ajmarin@myjetsaver.com)>  
**Subject:** Fwd: \*\*Operators Beware\*\*  
**Date:** October 15, 2019 at 11:10:24 AM EDT  
**To:** "Justin@privateflite.com" <[justin@privateflite.com](mailto:justin@privateflite.com)>

Alejandro J. Marin

Chief Executive Officer

My Jet Saver | [14970 NW 42 Ave](#) | [Suite 45-20](#) | Opa-Locka | Florida | 33054

Ph: +1(305)537-9433 | Cell: +1(954)288-0874 | Cell: +1(954) 225-7372 |

Email :[ajmarin@myjetsaver.com](mailto:ajmarin@myjetsaver.com)

[www.myjetsaver.com](http://www.myjetsaver.com)



MyJetSaver\_Logo\_Artwork

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

Begin forwarded message:

**From:** Carla Pazos <[cpazos@myjetsaver.com](mailto:cpazos@myjetsaver.com)>  
**Date:** October 5, 2019 at 5:41:41 PM EDT  
**To:** Alejandro Marin <[ajmarin@myjetsaver.com](mailto:ajmarin@myjetsaver.com)>  
**Subject:** Fwd: \*\*Operators Beware\*\*

Carla Pazos  
My Jet Saver  
201-414-8078



Begin forwarded message:

**From:** Kelly Moisey <kelly.moisey@flystarflight.com>  
**Date:** October 5, 2019 at 9:48:02 AM EDT  
**To:** Carla Pazos <cpazos@myjetsaver.com>  
**Subject:** FW: \*\*Operators Beware\*\*

Kind Regards

Kelly Moisey | Vice President

T: +1 201 393 0455 | M: +1 610 442 7468 | E: [Kelly.Moisey@flystarflight.com](mailto:Kelly.Moisey@flystarflight.com)

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**From:** [tdrummond@emreair.com](mailto:tdrummond@emreair.com) <[tdrummond@emreair.com](mailto:tdrummond@emreair.com)>  
**Sent:** 03 October 2019 20:05  
**To:** Kelly Moisey <kelly.moisey@flystarflight.com>  
**Subject:** Fwd: \*\*Operators Beware\*\*

Begin forwarded message:

**From:** Omar Diaz <[omard@flyaltius.com](mailto:omard@flyaltius.com)>  
**Date:** October 3, 2019 at 5:45:34 PM EDT  
**To:** Toni Drummond <[tdrummond@emreair.com](mailto:tdrummond@emreair.com)>  
**Subject:** Fwd: \*\*Operators Beware\*\*

Sent from my iPhone

Begin forwarded message:

**From:** Rich Leppert <[rleppert@senecaflight.com](mailto:rleppert@senecaflight.com)>  
**Date:** October 3, 2019 at 17:39:58 EDT  
**To:** Kerry Sailler <[ksailler@jetasg.com](mailto:ksailler@jetasg.com)>, "Morrison, Daniel ([Dan.Morrison@scaviation.net](mailto:Dan.Morrison@scaviation.net))" <[Dan.Morrison@scaviation.net](mailto:Dan.Morrison@scaviation.net)>, "Harrison, Matthew ([mharrison@voyagerjet.com](mailto:mharrison@voyagerjet.com))" <[mharrison@voyagerjet.com](mailto:mharrison@voyagerjet.com)>, ACI Charter <[charter@ACIJET.COM](mailto:charter@ACIJET.COM)>, "charter@primejets.com" <[charter@primejets.com](mailto:charter@primejets.com)>, "Adam Velett" <[avelett@EXECUJETCHARTER.COM](mailto:avelett@EXECUJETCHARTER.COM)>, Aero Jet Services <[charters@AEROJETSERVICES.COM](mailto:charters@AEROJETSERVICES.COM)>, "charter@airstarcharter.com" <[charter@airstarcharter.com](mailto:charter@airstarcharter.com)>, AJ Becker <[aj@eliteair.com](mailto:aj@eliteair.com)>, "Alerion Charter ([Charter@FlyAlerion.com](mailto:Charter@FlyAlerion.com))" <[Charter@FlyAlerion.com](mailto:Charter@FlyAlerion.com)>, Alex Aponte <[aaponte@TalonAirJets.com](mailto:aaponte@TalonAirJets.com)>, Alex Armijo <[AArmijo@mountainaviation.com](mailto:AArmijo@mountainaviation.com)>, Alex McMahon <[alex.mcmahon@dumontde.com](mailto:alex.mcmahon@dumontde.com)>, "Operator Ali Aeroways ([alaux@flyadvanced.com](mailto:alaux@flyadvanced.com))" <[alaux@flyadvanced.com](mailto:alaux@flyadvanced.com)>, Amanda Jackson <[ajackson@aviationcharters.com](mailto:ajackson@aviationcharters.com)>, Amber Salvatore <[Amber.Salvatore@meridian.aero](mailto:Amber.Salvatore@meridian.aero)>, Andon Donev <[andon@flycjc.com](mailto:andon@flycjc.com)>, "Andrea Zarley" <[azarley@jetselectaviation.com](mailto:azarley@jetselectaviation.com)>, IG Charter <[charter@fly-ig.com](mailto:charter@fly-ig.com)>, Andres Quiroz <[aquiroz@flyej.com](mailto:aquiroz@flyej.com)>, Scott Hughes <[dispatch@abjets.com](mailto:dispatch@abjets.com)>, Andrew Farine <[andrew.farine@silverair.com](mailto:andrew.farine@silverair.com)>, "Angelika Neuberger ([aneuberger@presidential-aviation.com](mailto:aneuberger@presidential-aviation.com))" <[aneuberger@presidential-aviation.com](mailto:aneuberger@presidential-aviation.com)>, "Angie Wessinger ([awessinger@flightworks.com](mailto:awessinger@flightworks.com))" <[awessinger@flightworks.com](mailto:awessinger@flightworks.com)>, Ann Lake <[charter@chantillyair.com](mailto:charter@chantillyair.com)>, Ann Lake <[annlake@chantillyair.com](mailto:annlake@chantillyair.com)>, "aph@naac.com" <[aph@naac.com](mailto:aph@naac.com)>, "apollard@shorelineaviation.net" <[apollard@shorelineaviation.net](mailto:apollard@shorelineaviation.net)>, April <[april@eastcoastjets.com](mailto:april@eastcoastjets.com)>, "Brown, Ashley" <[charter@flycfm.com](mailto:charter@flycfm.com)>, Ashley Battisti <[abattisti@fly-ig.com](mailto:abattisti@fly-ig.com)>, Ashley King <[ashley.king@gojetit.com](mailto:ashley.king@gojetit.com)>, Ashley Pitkewicz <[ashleyp@excelaire.com](mailto:ashleyp@excelaire.com)>, "Ashley Serafin ([ASerafin@planemasters.com](mailto:ASerafin@planemasters.com))" <[ASerafin@planemasters.com](mailto:ASerafin@planemasters.com)>, ATI JET <[info@atijet.com](mailto:info@atijet.com)>, "Atlanta East Aviation" <[avjets@msn.com](mailto:avjets@msn.com)>, Beau Carter <[bcarter@pegjet.com](mailto:bcarter@pegjet.com)>, BETH FALWELL <[beth@kouryaviation.com](mailto:beth@kouryaviation.com)>, Blanca Savage <[bsavage@flyjetedge.com](mailto:bsavage@flyjetedge.com)>, Bob Hickey <[Bob.Hickey@flyfairwind.com](mailto:Bob.Hickey@flyfairwind.com)>, Bob Platten <[Bob.Platten@meridian.aero](mailto:Bob.Platten@meridian.aero)>, Breanna Dale <[breanna@amjets.com](mailto:breanna@amjets.com)>, Brett Rud <[br@pinnacleaviation.com](mailto:br@pinnacleaviation.com)>, Brian Chapman <[bchapman@wingaviation.com](mailto:bchapman@wingaviation.com)>, Brian Curtis <[brian@VENTUREJETS.COM](mailto:brian@VENTUREJETS.COM)>, Brian Huber <[bhuber@EJMJETS.COM](mailto:bhuber@EJMJETS.COM)>, Brian Pillion 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**Subject: RE: \*\*Operators Beware\*\***

There was a posting a few years ago about Metropolitan Jets ... same outcome. Agreed. Beware!



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**Subject: \*\*Operators Beware\*\***

Hi Guys,  
 I have heard this story 3 times today so I thought best to share with the fellow Operators.

Metropolitan Aviation – Marketing at NextFlight  
 As I understand it, they book the trips, get the payment and cannot complete the flights for one reason or another and brokers are unable to get their money back.  
 NextFlight tried to recover a flight using us however they were unable to execute the contract properly and we walked away from the trip.

Players

Ben Gottshall  
 Alan Cook  
 John Wood  
 Justin Sullivan

There is more to this story.  
 Justin Sullivan of PrivateFlite/UbAir and now AJAX Jets had a Falcon 50 on Metropolitan's Cert and recently moved it to FL based MyJetSaver Cert and I believe the same shenanigans may continue over there.

I know many of you folks outsource so I wanted to give a heads up!

If any one has any Operator/Broker horror stories to share I encourage it to save us all the headache.

Thanks and have a great day!

Sincerely,  
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